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## INTEROFFICE MEMORANDUM

DATE: October 9, 1997

TO: M. E Hickman, RMRS Engineering, T130F, X6386

FROM: S. M. Nesta, Compliance and Performance Assurance, National Environmental Policy Act, T130C, X6386 *SM Nesta*

SUBJECT: COMPLIANCE AND PERFORMANCE ASSURANCE COMMENTS ON  
SEPTEMBER 1997 779 CLUSTER DECOMMISSIONING OPERATIONS PLAN  
- SMN-191-97

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Attached are comments from the National Environmental Policy Act (Attachment 1) and Air Quality Management (Attachment 2) groups of Compliance and Performance Assurance on the subject document.

Please do not hesitate to contact me at X6386 or Bill Moore of Labat Anderson/NEPA at X8132 if you have any questions or need additional information.

Attachments (2): As Stated

cc:  
K. North, K-H  
R. C. Nininger, K-H  
C. A. Patnoe, K-H  
file

**Kaiser-Hill National Environmental Policy Act Group**  
**Comments on the**  
**September, 1997 779 Cluster Decommissioning Operations Plan**

The NEPA Values section of the DOP (section 9.4) has been strengthened by the addition of material analyzing alternatives to the proposed action. Though very brief, it is adequate. We also take note of the fact that the Water Quality section has been modified in response to the decision to leave the basement of Bldg. 779 in place with stairways to the basement sealed. In view of the potential implications for groundwater whenever the basement is removed, why is this element of the project being postponed?

There are two significant variance in section 9.4 from the NEPA values material prepared for the document last April.

1. One is in section 9.4.5, Plants and Animals, where the commitment to revegetate disturbed areas has been eliminated. This commitment needs to be reinstated.
2. The other is in the fourth paragraph of section 9.4.11. The wording about how any groundwater would be handled needs to be reinstated.



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## INTEROFFICE MEMORANDUM

DATE: October 8, 1997

TO: S. M. Nesta, K-H NEPA, T130C, X6386

FROM: *C.A.P. Patnoe*  
C. A. Patnoe, K-H Air Quality Management, T130C, X2440

SUBJECT: AIR QUALITY REVIEW OF THE BUILDING 779 DECOMMISSIONING  
OPERATIONS PLAN DATED SEPTEMBER 1997 - CAP-114-97

Ref: S. M. Nesta letter #SMN-187-97 to distribution, entitled "Review of Building 779  
Decommissioning Operations Plan (DOP) Dated September 1997" and attached  
Building 779 DOP

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The modified Building 779 Decommissioning Operations Plan (DOP) dated September 1997 has been reviewed with respect to applicable air regulatory requirements and compliance. Air Quality Management/Radian Corporation reviewed the DOP, and have the following comments:

- Section 7.1.1 Health and Safety Scope

- The scope paragraph states that "the purpose of this section is to describe the controls and monitoring programs to be utilized during the decommissioning of the 779 Cluster to ensure protection of the decommissioning employees, surrounding workers, the public, and the environment from potential and real hazards...."

*Comment:* The Health and Safety section does not address protecting the public and surrounding environment even though you list it as part of the scope. We suggest that you address the controls and policies that are in place to protect the public and surrounding environment.

- Section 9.2.1 Air

- The first paragraph states that "fugitive particulate emissions will be generated from soil demolition and transport".

*Comment:* We suggest that the word soil be deleted and the sentence read "fugitive particulate emissions will be generated from demolition and transport activities".

- The first paragraph states that "The substantive requirements that would otherwise be incorporated into a control plan are embodied in the RFETS Environmental Restoration

amendments. The existing Radioactive Ambient Air Monitoring Program (RAAMP) continuously monitors for potential airborne dispersion of radioactive materials from the Site into the surrounding environment. Thirty-one samplers comprise the RAAMP network. Twelve of these samplers are deployed at the Site perimeter and are used for confirmatory measurements of off-site impacts. The others are used for backup, should there be a need for determining local impacts from decommissioning or clean-up projects. During the demolition of Building 779 additional monitors within the existing ambient network located in the immediate area of Building 779 will be identified, and the frequency of filter collection and filter analysis at those locations will be adjusted, if necessary, to provide timely information on potential project emissions. Air emissions from Building 779 strip-out activities will be monitored by the existing effluent air monitoring system currently in place in the Building 779 plenum buildings."

- Section 9.2.6 Asbestos

*Comment:* You should list regulatory notification requirements for asbestos abatement mandated in Reg. 8, Part B, Section III B.

- Section 9.4.3 Air Quality

- The fifth paragraph states that "There will be significant, short term fugitive dust emissions during the demolition of the structure itself without taking mitigation measures".

*Comment:* This sentence makes it sound like there will be no mitigation controls in place when the structure is demolished and it will result in significant, short term fugitive dust emissions. A CDPHE-approved dust control plan must be in place prior to the demolition of the structure. This plan must describe measures that will be implemented to control dust emissions (such as water sprays) during the demolition phase. We suggest that this section read "There is a potential for significant, short-term fugitive dust emissions during the demolition of the structure. Mitigative measures will be taken to minimize dust emissions".

*General Comment:* It will be necessary for Kaiser-Hill Air Quality Management (AQM) to review subsequent documents, and to continuously provide guidance to project personnel throughout the duration of this project. Kaiser-Hill AQM has assigned Mike Putney of AQM/Radian as their representative to the Building 779 Decommissioning project team.

Air Quality Management should be informed of any changes to project parameters or the DOP. Please contact me, or Mike Putney of AQM/Radian Corporation at X2692 for any questions regarding this letter.

MTP

cc:

M. Hyder (Radian)

B. Moore (Labat Anderson)

M. Putney (Radian)